

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DAVID AND LAURA DAVIS)	
)	
COMPLAINANTS)	
V.)	CASE NO.
)	2009-00420
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and four copies of the following information, with a copy to all parties of record. The information requested herein is due on or before January 22, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Provide in detail LG&E's policy regarding when a residential customer is required to pay a deposit.
2. Fully explain the reasons why Complainants were required to pay a deposit in July 2009.
3. Fully explain why LG&E changed its policy in July 2009 to allow its customer service representatives the ability to set up payment arrangements.
4. Provide the authority under which LG&E can void a deposit installment payment plan and require the customer to pay the deposit amount in full.
5. Explain why Complainants' service was disconnected on September 30, 2009 after having been informed by an LG&E representative on September 22, 2009 that Complainants' account was corrected and the payment plan was "back on."

6. Explain LG&E's policy and practices related to the timeliness of reconnection of customers that have been disconnected due to an error on the part of LG&E.

7. Fully describe the bill payment process using Bill Matrix.

8. Prior to posting a payment, how does Bill Matrix verify that the account number provided by an LG&E customer is the correct account number associated with that customer's account?


9. Were Complainants advised of LG&E's policy of refunding customers' deposits with interest after twelve months of maintaining a satisfactory payment record?

10. Provide copies of any and all audio recordings of telephone conversations between Complainants and representatives of LG&E relating to the allegations contained in the complaint.

11. Provide copies of any and all correspondence between Complainants and LG&E relating to the instant dispute.

12. Provide the current status of Complainants' account.

13. Refer to paragraph 3.dd. of LG&E's Answer. Explain why LG&E is without knowledge to confirm the time that Complainants' service was disconnected.



Jeff Derouen
Executive Director
Public Service Commission
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DATED: JAN - 8 2010

cc: Parties of Record

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